Bell Atlantic
1300 I Street N.W.
Suite 400 West
Washington, DC 20005
202 336-7824 Fax 202 336-7922
E-Mail: Dolores.A.May@BellAtlantic.com

Dee May
Director
Federal Regulatory Affairs

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

@Bell Atlantic

Ex Parte

Ms. Magalie Roman Salas
Secretary
Federal Communications Commission
445 12th Street, SW – Portals
Washington, DC 20554

> RE: *Application by New York Telephone Company (d/b/a Bell Atlantic – New
> York), et al., for Authorization To Provide In-Region, InterLATA Services
> in New York, Docket No. 99-295*

Dear Ms. Salas:

This responds to questions that the Commission's Staff has asked concerning BA-NY's
operations support systems (OSS) and the interfaces provided to CLECs to obtain access
to them. . We are filing a confidential portion of the submission and a redacted version of
the entire submission in accordance with the protective order entered by the Commission
in the above-captioned proceeding.

> 1.   Effect on Reject Rates of Phase I Flow Through Changes: As a
> number of parties have pointed out, BA-NY continues to enhance the flow
> through capabilities of its systems on a scheduled committed to with the New
> York PSC. A number of these enhancements (referred to as Phase I) were
> implemented on October 30. BA-NY has examined preliminary results of these
> enhancements over the first 10 days of November. As Mr. Miller explained, in the
> first 10 days of November, overall order volumes were approximately 40%
> greater than the volume from an average 10 day period in October. Yet, despite
> the continuing increase in overall order volumes, the total number of orders
> requiring manual processing by the TISOC declined by 6% compared to the total
> number of orders processed manually during the average 10-day period in
> October. (See Attachment 1.)
>
> The staff also asked what the reject rates for CLEC orders have been since these
> enhancements were implemented. A comparison of the average 10 day period in
> October and the first 10 days in November shows that reject rates have declined
> as CLECs continue to gain experience generating correct orders. During the

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average 10-day period in October, the reject rate to CLECs was 25%. This declined to 22% during the first 10 days of November. [1]

As discussed in Bell Atlantic's reply comments (Miller/Jordan/Zanfini Reply Decl. ¶ 42), the focus of these enhancements was on UNE platform orders (although the enhancements are likely to have an impact on flow through rates for other order types as well). As would be expected, therefore, the preliminary results show that the impact of the enhancements on UNE platform orders is even more striking. For UNE platform alone, the order volumes increased more than 55%, yet the number of platform orders requiring manual handling declined by 17%. Likewise, the reject rate for platform orders declined from 23% to 20%.

    2.   Parsed CSR Response Times: Staff has asked for clarification on why the response times for parsed CSR transactions are longer than for unparsed CSRs. See Miller/Jordan/Zanfini Reply Decl. ¶¶ 18, 21 (addressing availability and response times of parsed CSRs). When a CLEC requests a parsed CSR, Bell Atlantic's systems must first retrieve the CSR from Bell Atlantic's records, and then must perform additional steps actually to parse the CSR – that is, Bell Atlantic's systems must take the information from the CSR (which is not stored in Bell Atlantic's records in a parsed or fielded format) and populate the fields to return a fielded or parsed CSR to the CLEC. It is this additional processing done on behalf of a CLEC that causes longer response times for parsed CSRs.

    3.   Telephone Number Reservation: Staff has asked for more detail on the process of selecting/reserving a telephone number for Bell Atlantic retail representatives compared to CLEC representatives. As previously explained (see, e.g., Miller/Jordan Decl. ¶ 24), CLECs and Bell Atlantic representatives obtain the same pre-ordering information from the same OSS, but in many instances, Bell Atlantic's gateway systems have simplified the transaction for CLECs. Attachment 2 displays a Telephone Number (TN) reservation transaction as it appears to a CLEC representative using the Web GUI to obtain access to the LiveWire OSS. Page 1 shows the information a CLEC representative must input for this transaction; page 2 shows the response screen returned by Bell Atlantic. In a residential TN reservation transaction, the CLEC may request from one to five numbers. As shown, when the CLEC requests more than one number, the response screen returns the requested number of telephone numbers, and the CLEC then selects the one desired by its end user.

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[1] Because these data (for both the average 10 day period in October and the first 10 days of November) were extracted for the purpose of tracking orders through the system to see how flow through rates can be improved, they were not extracted on exactly the same basis as the Carrier-to-Carrier reports are produced. In particular, the percent of orders rejected only includes the first time an order is rejected and does not count any subsequent rejects if an order is rejected multiple times. The Percent Rejects as reported in the Carrier-to-Carrier reports counts all transactions including multiple rejections for the same order.

Attachment 3 shows a TN reservation transaction as it appears to a Bell Atlantic representative using LiveWire. As shown on page 1, the representative inputs the house number and street address and hits Enter. The screen returned to the representative is shown on page 2 – the representative must type in the number of the transaction he or she wishes to perform and hit Enter again. LiveWire then returns the screen shown on page 3 to the Bell Atlantic representative – the representative again types in the function he or she wishes to perform and hits Enter again. A fourth screen is returned to the representative (page 4), which allows the representative to indicate the type of telephone number desired (the CLEC representative has the ability to select among the same types of telephone numbers). The representative types in her selection and hits Enter again. The fifth screen returns five telephone numbers for the representative to select the one desired by the end user.

As previously explained, Bell Atlantic is transitioning to LiveWire from the PREMIS back-end system. Where a customer's location is still in the PREMIS database, the transaction looks slightly different. Attachment 4 displays a TN reservation transaction as it appears to a CLEC representative using the Web GUI to obtain access to PREMIS. Page 1 again shows the information a representative must input. Page 2 shows the response returned to the representative – here, PREMIS validates the end user's address before reserving a telephone number. Once the CLEC's customer's address has been validated, the CLEC returns to the first screen, edits the transaction to request a telephone number, and resubmits it. The CLEC then receives the screen shown on page 3 with a telephone number.

Attachment 5 shows a TN reservation transaction as it appears to a Bell Atlantic representative using PREMIS. As shown on page 1 (upper left), the representative must indicate the transaction type – here, the first step is to validate the address, and the representative types "PREM." The representative must also enter the appropriate Street Address Guide Area (SAGA) for the request. There are more than a dozen SAGAs, depending on the end user's location (this step is automatically performed for the CLEC representative by Bell Atlantic's gateway system). Once the CLEC has entered the correct SAGA and the customer's address, she hits Enter, and the system verifies the customer's address. The representative must then change the transaction she is performing from "PREM" to "TNS" (upper left, page 2). She then hits Enter, and receives a response as shown on page 3.

As previously explained, CLECs have the same ability to obtain a telephone number as do Bell Atlantic's own retail representatives. See Miller/Jordan Decl. ¶¶ 17, 19. In PREMIS, when a representative (whether CLEC or Bell Atlantic) selects a telephone number, it is removed from the pool of available numbers for 30 days. If the representative submits an order with the same address for that telephone number within the 30 days, it will be assigned to that account. In LiveWire, the process is similar, but in New York a representative, whether

CLEC or Bell Atlantic, can remove a number from the pool for three months for residence and twelve months for business.

4.   Integration: As explained in the Application and Reply Comments, Bell Atlantic has met its commitment to provide application-to-application pre-ordering and ordering interfaces that allow the CLECs to integrate these functions in their own systems. See, e.g., Miller/Jordan Decl. ¶ 22; Miller/Jordan/Zanfini Reply Decl. ¶ 24. Staff has asked for additional clarification on KPMG's statement that certain fields were not exactly correlated between pre-ordering and ordering, and on AT&T's claims in its reply comments that "inconsistencies between the pre-ordering information and the BA-NY ordering forms" require AT&T to populate order forms manually.

KPMG performed a limited number of integrated pre-order/order transactions where the information returned in the pre-order response was copied, without modification, into the order. KPMG Report POP5 IV 79. In addition, a much larger number of KPMG's test ordering transactions relied on information obtained from pre-ordering transactions to populate the orders. NY 271 Tr. 2153. KPMG noted that in some instances, the field names or formats were not consistent between the pre-ordering and ordering transactions. KPMG Report POP5 IV 128. KPMG testified that this could be handled by a CLEC that chose to integrate the pre-order and order functions in its systems by mapping the pre-ordering information to the order forms. NY 271 Tr. 2205. KPMG also testified that a more logical process would be for the CLEC to take the pre-ordering information into its own systems so that it will have the necessary customer information in its records. That information then would be drawn from the CLEC's systems (and information obtained from the customer) to populate an order. NY 271 Tr. 2167, 2170, 2205. KPMG also testified that the review of the documentation needed to assess the inconsistencies between pre-order and ordering fields or formats could be "accomplished in a matter of several days." NY 271 Tr. 2006.

AT&T nevertheless claims that the inconsistencies somehow prevent it from completely integrating the CSR and address validation pre-ordering functions with ordering. Crafton/Connolly Reply Decl. ¶ 32. AT&T also argues that the New York PSC is wrong to point to other CLECs as evidence that the pre-ordering and ordering interfaces are integratable. Id. ¶¶ 31, 33. According to AT&T, CTC has only integrated one pre-order function – CSR retrieval – with ordering. But that is all CTC wanted to integrate for its current operations. Moreover, as previously explained, retrieval of CSRs constitute some 80 percent of all pre-order transactions. CTC's successful integration of the CSR function shows that the "inconsistencies" do not prevent integration of this pre-ordering function with ordering.

Similarly, AT&T claims that another carrier – MCI WorldCom – has not been able to integrate the CSR and address validation pre-ordering functions with

ordering. But MCI WorldCom's reply comments make clear that it has integrated both CSR retrieval and address validation – the two functions AT&T claims it cannot integrate completely – with ordering. See MCI WorldCom Reply Comments at 21, n. 23.

Both AT&T and MCI WorldCom claim that other pre-order functions are not yet integrated with ordering. As previously explained, however, Bell Atlantic provides other pre-order functions that can be integrated with ordering, and the fact that AT&T and MCI WorldCom have not yet done so results from their own lack of readiness, not from any failure on Bell Atlantic's part. Miller/Jordan/Zanfini Reply Decl. ¶ 16. MCI WorldCom has completed EDI testing for telephone number (TN) reservation, TN assignment, the exchange and return of telephone numbers, due date availability and directory listing information. They have not moved these functions into production because of their own Y2K moratorium. See id.

Similarly, BA-NY has met each scheduled test date set by the New York PSC for the development and delivery of the CORBA pre-ordering interface, but each time BA-NY has brought up a new transaction in production, AT&T has been at least 20 days behind in testing. Id. at ¶ 23. Indeed, AT&T admits that it has not yet tested other pre-ordering functions such as due date availability, product and service availability, and telephone number reservation in CORBA. Crafton/Connolly Reply Decl. ¶ 32. But the fact that AT&T and MCI WorldCom have not yet chosen to use these functions or to integrate them with their ordering systems does not mean that Bell Atlantic has failed to provide integratable interfaces.

Finally, as KPMG noted, see NY 271 Tr. 2205, Bell Atlantic has worked to minimize inconsistencies in the fields and formats to further simplify use of the pre-order and order interfaces and is continuing to do so. Examples are the rollout of LiveWire, beginning with the August release, the implementation of LSOG 4 in February 2000, a schedule which was negotiated with the CLECs, and ongoing collaborative discussions with the CLECs which will result in still further commonality in mid-2000.

5.   Jeopardy Notification: As explained in the Application and Reply Comments, Bell Atlantic provides Open Query System (OQS) reports which are generated by the Work Force Administration (WFA) system for both provisioning and maintenance to the CLECs. See, e.g., Application 44; Miller/Jordan Decl. ¶¶ 18, 66-67; Reply 35-36; Miller/Jordan/Zanfini Reply Decl. ¶ 50. Bell Atlantic posts OQS reports three times each day. As a result, any status information transmitted by the Bell Atlantic technician during the day to the WFA system will be available with the next update. Bell Atlantic retains the reports for approximately 30 days so that CLECs can go back to check on earlier reports if desired. The OQS reports Bell Atlantic provides to CLECs were agreed to in negotiations during the collaborative proceedings described in Bell Atlantic's

reply comments. Miller/Jordan/Zanfini Reply Decl. ¶ 50. Staff asked for further clarification on what notice is provided to Bell Atlantic retail representatives.

First, it is important to understand that Bell Atlantic's retail representatives only take incoming calls; except in the very rare circumstances described below, they do not call customers with respect to jeopardies. If a customer calls a retail representative to ask about the status of an order, the representative must first check the status of the order in SOP or WFA. In most cases this provides sufficient information for the representative to answer a customer question. If the representative needs additional information, he or she must call the dispatch center. Miller/Jordan/Zanfini Reply Decl. ¶ 50. The process for CLECs exactly parallels the process followed by retail representatives. If a CLEC needs additional information beyond that available through the OQS reports (which are generated from WFA), it can check the order status in SOP or the installation status (from WFA) through the pre-ordering interfaces. If further information is needed, the CLEC would have to call the TISOC or RCMC (for provisioning or maintenance, respectively). These support centers can call the dispatch center foreman, if needed. Id.

Bell Atlantic's dispatch center is responsible for scheduling technicians to perform both installations and maintenance and repair work each day. For retail orders, the dispatch center will also call Bell Atlantic customers when an appointment has been missed to reschedule the appointment. The dispatch center gets an OQS report from WFA late in the day which shows which orders have been completed, which were missed for Bell Atlantic reasons, and which were missed for subscriber reasons. (The OQS report contains status information that has been transmitted by Bell Atlantic technicians during the day to WFA.) The dispatch center then tries to call the customers whose appointments were missed for Bell Atlantic reasons or for subscriber reasons to schedule a new appointment.

Because the CLECs do not want Bell Atlantic to call their customers, Bell Atlantic must rely on the CLECs to reschedule any missed appointments for their end users. In order to allow them to do that, Bell Atlantic provides CLECs with OQS reports (which are generated by WFA) for both provisioning and maintenance three times each day. Id. These reports will include any status information transmitted by the BA-NY technician during the day to WFA, including the identity of any orders that he or she knows will not be completed that day. Id. The information transmitted by the technician will be available to the CLEC with the next update. Id. The OQS reports show (separately for resale and unbundled elements, and separately for provisioning and maintenance) orders that have been completed, orders that have been (or will be) missed for Bell Atlantic reasons, and orders that have been (or will be) missed for subscriber reasons.

As noted above and in the reply comments (see Miller/Jordan/Zanfini Reply Decl. ¶ 50), Bell Atlantic's customer service representatives only get jeopardy notices

and make outgoing calls to customers in extraordinary, rare circumstances. Mr. Dowell, who worked in the dispatch center for ten years, was able to identify only four times when the dispatch center requested that the retail customer service representatives proactively call customers to reschedule appointments. Those instances were the 1983 strike, Hurricane Gloria (which hit Long Island severely) in 1986, the 1989 strike, and a labor problem that affected Queens in 1990.

During the strikes, orders were taken but not given due dates. When the strikes ended and the labor force was back to full strength, the customer service representatives began calling customers to negotiate due dates for orders and maintenance work not done during the strike. As Hurricane Gloria approached and it became clear that Long Island would be hit severely, the dispatch center asked the service representatives to call customers to renegotiate due dates as far out as possible. The 1990 labor problem lasted approximately two weeks, during which time the company attempted to shift work force to cover the load in Queens, as well as the areas not subject to the labor issues. When it became clear that the available force was being overwhelmed by the work load, the dispatch center asked the service representatives to call customers to renegotiate due dates.

Although these instances occurred before the advent of CLECs, these types of circumstances would be communicated to CLECs by an Abnormal Event Notice, or by a letter which is sent electronically to all CLECs. These notices allow CLECs to contact their customers to renegotiate due dates just as Bell Atlantic representatives would be notified by the dispatch center to call Bell Atlantic customers to renegotiate due dates. For example, approximately one week before the strike in 1998, Bell Atlantic notified CLECs of the potential for a work stoppage and advised them that due dates following the strike deadline might be in jeopardy. Indeed, Bell Atlantic provides notice to CLECs even of lesser events that they should be aware of in negotiating due dates with their customers. Attachment 6 contains copies of an Abnormal Event Notice (and its resolution), and a letter advising CLECs of the effect of an upcoming holiday on available due dates.

> 6.   Documentation: Staff has asked for clarification concerning certain KPMG references that AT&T and MCI WorldCom have cited in support of their claims that Bell Atlantic's documentation is inadequate. As explained in the Application and Reply Comments, KPMG's evaluation of Bell Atlantic's certification process and documentation was based on KPMG's experience at the time it went through the process, and dealt with historical issues that have since been corrected. Miller/Jordan Decl. ¶ 102; Miller/Jordan/Zanfini Reply Decl. ¶¶ 8-9.

AT&T and MCI WorldCom have selectively cited and paraphrased certain references to the KPMG Report, while omitting others – sometimes contained in the same paragraph as those cited. As a result, their arguments on documentation are misleading. A few examples illustrate their flaws:

AT&T Reference	What AT&T Omitted
"In some areas, documentation was not sufficiently complete and accurate to allow KPMG to create EDI transactions (ordering and pre-ordering) in certification testing. KPMG Report, p. IV-10 (TCR P1-4)." Crafton/Connolly Decl. ¶ 229. See also MCI Comments at 21, n. 29.	1. KPMG's comment referred to certification testing, which occurred very early in KPMG's evaluation – before the start of live transaction testing. POP1 IV 3. 2. The last sentence of the reference cited by AT&T and MCI WorldCom states: "The documentation has improved since our certification efforts." POP1 IV 19 (Test Cross Reference P1-4). 3. The exceptions issued by KPMG (see Crafton/Connolly ¶ 229, n. 113) were all satisfied, resolved, and closed.
"The TIS DCAS Guide for the Web/GUI refers to pre-ordering functionality that was not available in that interface. *Id.*, p. IV-35, IV-41 (TCR P2-2)."	1. The Test Cross Reference cited by AT&T states that the functions were not available "for the test." POP2 IV 35. 2. The specific function referenced by KPMG was "access to the CABS CSR inquiry," which is now available using either EDI or the Web GUI.
"'The business rules for [EDI] pre-order lack specificity, thereby causing the CLECs to potentially submit a transaction in error.' *Id.*, pp. IV-106, IV-107 (TCR P5-2)."	1. The lead sentence in the reference from which AT&T took its quote states: "KPMG was able to submit pre-order test cases and receive subsequent responses from BA-NY." POP5 IV 106 (Test Cross Reference P5-2). 2. AT&T omits the footnote that follows the sentence it quoted. The footnote references Exception 55, which was resolved and closed.
"BA-NY received a rating of 'Not Satisfied' as to whether its documents provide useful contact lists and help desk numbers to CLEC. Help Desk numbers are not described in BA-NY's business rules for pre-ordering and ordering, and it is not clear what number to call. As a result, CLECs must call multiple sources before the problem can be resolved. *Id.*, pp. IV-220 – IV-221 (TCR p. 9-16)"	1. The lead sentence in the reference cited by AT&T states: "BA Help Desk (HD) numbers are provided in the documentation in most cases." POP9 IV 220 (Test Cross Reference P9-16). 2. KPMG's concern with the documentation was the placement of the numbers within the documentation. *Id.* 3. The CLEC Handbooks were revised in September to address this concern.
"'BA-NY documentation does not adequately reflect the Help Desk functions' with respect to pre-ordering, ordering, and provisioning. *Id.*, p. IV-244 (TCR P10-3); *see also id.*, p. IV-257."	The sentences immediately preceding AT&T's reference state: "The functions of the Systems Solution Center, Order Support Center, and the ISOC Work Centers have been clearly defined. In addition, BA-NY has instituted warm-transfer procedures to refer calls to the appropriate HD when incoming CLEC calls are initiated to the wrong BA-NY HD." POP10 IV 244 (Test Cross Reference P10-3).
"BA-NY's distribution procedures on its RETAS student users' guides 'have notable	1. KPMG's overall conclusion with respect to Document Management states: "M&R

shortcomings,' especially since the document is used by CLECs as a reference guide as well as a training guide. *Id.*, p. V-108 (TCRs M6.1-3, M6.2-3). Student user guides also 'revealed a lack of document organization.' *Id.* (TCRs M6.1-9, M6.2-9). Version control is imperfect in the case of student users' guides. *Id.*, p. V-109 (TCRs M6.1-5, M6.2-5). These guides also make no mention of notification for errors or omissions. *Id.*, p. V-109, (TCR M6.2-7)."	Document Management revealed no major gaps or deficiencies." M&R6 V 108. 2. KPMG's overall conclusion with respect to Document Structure and Format states: "M&R document structure and format with regard to the Handbook Series revealed no major gaps or discrepancies." *Id.* 3. KPMG noted that the Student Users' Guides "contain a table of contents that adequately defines the document's structure. (M6.1-9), (M6.2-9)" 4. At least as early as the last Technical Conference in the New York 271 proceeding, Bell Atlantic had agreed to include RETAS documentation in the Change Management process. NY 271 Tr. 3523.
"The CLEC handbooks are not clear in their presentation of the applicable business rules regarding transmission of the daily usage file. *Id.*, p. VI-69 (TCR B6.2-4)."	The final two sentences in the reference cited by AT&T state: "Communications with the account manager initiates the process to establish connectivity. Account managers and members of BA-NY technical support explain all of the business rules." BLG6 VI 69.

Finally, AT&T fails to note that, with the exception discussed in the chart above, all of the references it cites received an evaluation from KPMG of "Satisfied, with Qualifications" or "Satisfied with Qualifications, Exception Addressed." As KPMG explained, such a result means "the evaluation criterion was <u>satisfied</u>, however, specific areas might need improvements." Executive Summary II 6 (emphasis added). In other words, the results would not have any serious business impact on CLECs. *See id.*

As outlined in the Public Notice (DA-99-2014) issued by the FCC on September 29, 1999, the 20-page ex parte limit does not apply to this ex parte since Bell Atlantic is responding to direct questions raised by Commission staff.

Please contact me with any questions.

Sincerely,

Attachments
Cc: A. Kearney
        E. Einhorn
        J. Patterson
        J. Mikes

Attachment 1

		Average 10 days in October	November 1st-10th	Increase; (decrease)
All Orders	Orders Received	61,706	87,901	42%
	Total CLEC Rejects (auto and manual)	15,176	19,216	27%
	...as % of total orders	25%	22%	
	Orders reviewed/entered manually by TISOC	30,137	28,342	(6%)
All UNE-P Orders	Orders Received	39,071	61,898	58%
	Total CLEC Rejects (auto and manual)	9,157	12,642	38%
	...as % of total orders	23%	20%	
	Orders reviewed/entered manually by TISOC	13,872	11,519	(17%)

CLEC Orders
Measurements collected for New York - part months

ATTACHMENT 2

TN Reservation Wholesale (GUI to LiveWire)

ATTACHMENT 3

TN Reservation Retail (LiveWire)

ATTACHMENT 4

TN Reservation Wholesale (GUI to PREMIS)

ATTACHMENT 5

TN Reservation Retail (PREMIS)

ATTACHMENT 6

Bell Atlantic Abnormal Event

Ticket: 7T1-06F

Status: Initial
State: MA
CLLI: NCKTMAUNIOF

----- ACTUAL EVENT -----
Distribution: Major
Date: 11/23/99   Time: 04:52:00 PM

Short Description: 302/T3X3/NCKTMAQ0010/NCKTMAUN DOWN
Resolution:

LATA: 128
NPA: 508
NXX: XX

----- RESTORATION -----
Restoral Time: Estimate
Date: Time:
     Total Outage Time: 0 Hrs 0 Min 0 Sec

----- EVENT -----
     Event Category: IOF/Transport
     Category Type: Fiber - Non Sonet Equipment
     Cause of Failure:

----- IF SWITCH OR SS7 FAILURE -----
     Type Failure:
     Switch Type:

----- IF LOCAL LOOP/SUB CABLE FAILURE -----
     Cable/PG Number & Counts:
     Total Number of Pairs:
     Aerial/Underground:
     Is the Cable Pressurized:
          Predictor / LES Indications:
     Location of Failure:
     Type of Cable:

----- IF IOF/Transport FAILURE -----
     Approximate # of T3s Affected: 3
     Approximate # of T1s Affected: 84 Number
     of Equivalent DS0 Circuits: 2016 Is this
     route Diversified:

----- EFFECT ON CUSTOMERS -----
     Type of Trouble Customer may report: CBC - Can't Be Called, CCO - Can't
Call Out

Type of Customers affected: ALL
Maximum Number of Customers Affected:
Number of Customer Reports: 4
Trouble Disposition Code:
Cause Code:
Has the E911 Contact been notified?:

Bell Atlantic Abnormal Event

Ticket: 7SK-HGB

Status: Resolution
State: RI
CLLI: NPRVRIMSDS1

----- ACTUAL EVENT -----
Distribution: Major
Date: 11/14/99   Time: 08:00:00 AM

Short Description: Contractor digging hit 3 buried cables
Resolution: Repair/splice 3 damaged cables

LATA: 130
NPA: 401
NXX: 401231,401232,401233,401353,401354

----- RESTORATION -----
Restoral Time: Actual
Date: 11/17/99   Time: 12:00:00 AM
      Total Outage Time: 64 Hrs 0 Min 0 Sec

----- EVENT -----
      Event Category: Local Loop/Sub Cable
      Category Type: Copper Span
      Cause of Failure: Facility Cut 22

----- IF SWITCH OR SS7 FAILURE -----
      Type Failure:
      Switch Type: DMS100

----- IF LOCAL LOOP/SUB CABLE FAILURE -----
      Cable/PG Number & Counts: 12x101-900, 1x101-900, 9x001-500
      Total Number of Pairs: 899
      Aerial/Underground: Underground
      Is the Cable Pressurized: Yes
            Predictor / LES Indications:
      Location of Failure: Buried
      Type of Cable:

----- IF IOF/Transport FAILURE -----
      Approximate # of T3s Affected:
      Approximate # of T1s Affected:
      Number of Equivalent DS0 Circuits:
      Is this route Diversified:

----- EFFECT ON CUSTOMERS -----
      Type of Trouble Customer may report: CBC - Can't Be Called, NDT - No
Dial Tone

Type of Customers affected: ALL
Maximum Number of Customers Affected: 500
Number of Customer Reports: 155
Trouble Disposition Code: 04 - Outside Plant
Cause Code: 24x - Other Utility
Has the E911 Contact been notified?:   Yes

June 29, 1998

«MR_MS» «FIRST» «LAST_NAME»
«TITLE»
«IC_COMPANY»
«ADDRESS»
«CITY», «STATE» «ZIP»

Dear «MR_MS» «LAST_NAME»:

The 4th of July, which falls on a Saturday this year, is a Bell Atlantic company holiday. Because the holiday falls on the weekend, most employees will be given Friday the 3rd as a day off.

The Telecom Industry Services Operations Center (TISOC) which serves Bell Atlantic-South is aware that some of our customers will operate with limited personnel on the 3rd and that for others it will be business as usual. In light of this, the TISOC (South) has chosen to operate with a limited staff, rather than close, on Friday, July 3rd. If you need to contact us, please use 888 TISOC 88 (888 847 6288) and follow the prompts to get assistance.

Even though the TISOC (South) will be open, some departments which play a role in the processing of your orders will not have personnel available. Therefore, Friday the 3rd should not be used as a due date, and it should be excluded when calculating intervals for the completion of service. You will however be able to submit orders via the usual methods, and they'll be processed by the TISOC personnel who are working on the 3rd.

Sincerely,